

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Amendment of Part 95 of the)
Commission's Rules to Establish)
a Very Short Distance Two-Way)
Voice Radio Service)

WT Docket No. 95-102
RM-8499

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**REPLY COMMENTS OF THE CONSUMER ELECTRONICS GROUP
OF THE ELECTRONIC INDUSTRIES ASSOCIATION**

The Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG") hereby replies to the comments that were filed in response to the Notice of Proposed Rulemaking in the above-captioned proceeding on October 2, 1995.¹

**I. ~~FAMILY RADIO SERVICE ENJOYS WIDESPREAD~~
SUPPORT AND SHOULD BE IMPLEMENTED IN A WAY
WHICH PROTECTS ADJACENT UHF TELEVISION
SPECTRUM FROM INTERFERENCE.**

The comments reflect significant support for creating a Family Radio Service ("FRS") and for making 14 UHF channels available for short-range, two-way voice communications. FRS will satisfy the sizeable demand that "exists for a low-cost, sophisticated two-way radio service capable of providing greater service reliability than citizens band ("CB")

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¹ See Amendment of Part 95 of the Commission's Rules to Establish a Very Short Distance Two-Way Voice Radio Service, Notice of Proposed Rulemaking, WT Docket No. 95-102, RM-8499, FCC 95-261 (released Aug. 2, 1995).

radio without the regulatory oversight of the GMRS."² As Cobra Electronics Corporation, EIA/CEG, and others have pointed out, FRS "should be very attractive to families and sports enthusiasts alike."³

FRS is not without its critics. A number of incumbent licensees of the General Mobile Radio Service ("GMRS"), from which the FRS channels would come, have criticized the Commission's proposal. Motorola, Inc. and Uniden America Corporation -- both of which produce equipment for the GMRS community -- correctly take exception to these criticisms. They indicate that the frequencies proposed for FRS are located between the main channels of the current GMRS, and that carefully tailored technical standards can ensure that FRS and GMRS operations will be compatible.⁴ These latter comments confirm EIA/CEG's enthusiastic support for the proposed radio service.⁵

In its initial comments, EIA/CEG emphasized the importance of limiting out-of-band emissions in order to avoid interference to television receivers.⁶ In addition, EIA/CEG urged the Commission to prescribe FRS labelling requirements to explain the possibility of

² Comments of Motorola, Inc., WT Docket No. 95-102, at 6 (Oct. 2, 1995) [hereinafter "Motorola Comments"].

³ Comments of Cobra Electronics Corporation, WT Docket No. 95-102, at 1 (Sep. 28, 1995); *see also* Comments of Consumer Electronics Group of the Electronic Industries Association, WT Docket No. 95-102, at 2 (Oct. 2, 1995) [hereinafter "EIA/CEG Comments"].

⁴ *See* Motorola Comments at 7; Comments of Uniden America Corporation, WT Docket No. 95-102, at 3 (Sep. 29, 1995).

⁵ *See* EIA/CEG Comments at 1.

⁶ *See id.* at 4.

interference to consumers.⁷ Given the likelihood that FRS units will soon become ubiquitous, particularly within American homes, EIA/CEG believes that a uniform consumer warning would be in order. In particular, manufacturers or suppliers of FRS units should be required to caution consumers that: (1) FRS units operate at frequencies that may cause interference to nearby television receivers; (2) to minimize or prevent such interference, FRS units should not be used near television receivers; and (3) if interference is experienced, moving FRS units away from the television receiver will often reduce or eliminate the interference. Such cautionary information should be placed on the packaging or in the instruction manual which accompanies the FRS unit.

The Commission recently adopted an identical requirement in the rulemaking proceeding in which it made additional frequencies available for cordless telephones. In that proceeding, the Commission concluded that a brief cautionary note, advising consumers what to do in the event of interference, would be appropriate -- even though the Commission found that the expanded operation of cordless telephones would not interfere with broadcast television receivers.⁸ The need to educate consumers regarding the potential consequences of FRS operations is equally great, and the burden on FRS manufacturers and suppliers would be minimal.

⁷ *See id.*

⁸ *See Amendment of Parts 15 and 90 of the Commission's Rules to Provide Additional Frequencies for Cordless Telephones*, 10 FCC Rcd 5622, 5625 (1995).

II. CONCLUSION

For all of the reasons set forth above and in its initial comments, EIA/CEG urges the Commission to authorize the introduction of FRS while at the same time protecting adjacent UHF television spectrum from interference and advising consumers how to deal with interference should it arise.

Respectfully submitted,

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October 16, 1995

CERTIFICATE OF SERVICE

I, Marc Berejka, do hereby certify that on this 16th day of October, 1995, I have caused a copy of the foregoing to be served via first class United States Mail, postage pre-paid, upon the persons listed on the attached service list.



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